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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;  
16 OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF LINDSAY COOPER  
IN SUPPORT OF PLAINTIFF WAYMO  
LLC'S ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL PORTIONS OF THE  
COURT'S ORDER GRANTING-IN-PART  
AND DENYING-IN-PART PLAINTIFF'S  
MOTION FOR PROVISIONAL RELIEF  
(DKT. 426)**

1 I, Lindsay Cooper, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set  
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Administrative Motion to File Under  
7 Seal Portions of the Court’s Order Granting-in-Part and Denying-in-Part Plaintiff’s Motion for  
8 Provisional Relief (Dkt. 426), filed concurrently herewith (the “Administrative Motion”). The  
9 Administrative Motion seeks an order sealing the following materials filed concurrently herewith:

Document	Portions to Be Filed Under Seal	Designating Party
Court’s PI Order (Dkt. 426)	Redacted and Highlighted Portions	Waymo (yellow highlighting)

13 3. Specifically, the Court’s Order Granting-in-Part and Denying-in-Part Plaintiff’s Motion  
14 for Provisional Relief (Dkt. 426) (“Court’s PI Order”) contains or refers to trade secret and  
15 confidential business information, which Waymo seeks to seal.

16 4. Portions of the Court’s PI Order (redacted portions and additional portions highlighted  
17 yellow) contain, reference, and/or describe Waymo’s asserted trade secrets. The information Waymo  
18 seeks to seal includes the confidential design and functionality of Waymo’s proprietary autonomous  
19 vehicle system, which Waymo maintains as secret. I understand that these trade secrets are  
20 maintained as secret by Waymo (Dkt. 25-47) and are valuable as trade secrets to Waymo’s business  
21 (Dkt. 25-31). The public disclosure of this information would give Waymo’s competitors access to in-  
22 depth descriptions—and analysis—of the functionality of Waymo’s autonomous vehicle system. If  
23 such information were made public, I understand that Waymo’s competitive standing would be  
24 significantly harmed.

25 5. Waymo’s request to seal is narrowly tailored to those portions of the Supplemental  
26 Brief and supporting exhibits that merit sealing, and the scope of information that Waymo is seeking  
27  
28

1 to seal is consistent with other administrative motions to seal that have already been granted by the  
2 Court in this case. (*See* Dkt. 416, 414, 406, 393, 392.)

3 I declare under penalty of perjury under the laws of the State of California and the United  
4 States of America that the foregoing is true and correct, and that this declaration was executed in San  
5 Francisco, California, on May 12, 2017.

6 By /s/ Lindsay Cooper

7 Lindsay Cooper

8 Attorneys for WAYMO LLC  
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